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July 20, 2004

**SUMMARY OF  
*EX PARTE* PRESENTATION**

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room TWA325  
Washington, DC 20554

**Re: New Part 4 of the Commission's Rules Concerning Disruptions to  
Communications, ET Docket No. 04-35**

Dear Ms. Dortch:

Today, David Kanupke and I, representing the United States Telecom Association (USTA), Karen Possner, representing BellSouth Corporation, Archie McCain, representing BellSouth Telecommunications, Inc., and Jim Lankford, representing SBC Operations, Inc., met with met with Barry Ohlson, Senior Legal Advisor to Commissioner Jonathan S. Adelstein, and Scott Bergmann, Commissioner Adelstein's Legal Advisor for Wireline Issues. The purpose of the meeting was to discuss the status and direction of the proceeding regarding service outage disruptions, ET Docket No. 04-35.

USTA expressed concern that the Commission may vote on an order regarding service disruptions before it has taken adequate time to consider all of the comments and reply comments filed in this docket. Consistent with its prior filings in this proceeding, USTA emphasized its objections to proposed reporting thresholds for outages affecting SS7 ISUP messages and DS3s. USTA repeated concerns about the increased regulatory and economic burdens that the proposed reporting requirements would impose on carriers as well as concerns about public disclosure of critical infrastructure information contained in outage reports. Finally, USTA explained its proposed alternative to the common metric proposed by the FCC, which is to rely on blocked call counts or on affected network access lines, if blocked-call data is unavailable.

Ms. Marlene Dortch

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In accordance with Section 1.1206(b)(2) of the Federal Communications Commission's rules, I am filing this letter electronically with your office for inclusion in the public record. Please feel free to telephone me at (202) 326-7223 with any questions.

Sincerely,

A handwritten signature in dark ink, appearing to read "Indra Sehdev Chalk", with a long horizontal flourish extending to the right.

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Indra Sehdev Chalk  
Corporate Counsel

cc: Barry Ohlson  
Scott Bergmann